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December 13, 2021

BY ECF

Hon. Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Maliek Brown v. City of New York, et al., 19 CV 1575 (NG)(RML)

Your Honor:

I represent the plaintiff. I write to request an extension of discovery from December 13, 2021 until February 13, 2022 and a corresponding adjournment of the December 13th conference. Defendants consent to this application. This extension is required due to the large number of defendants and an unusually broad scope of issues and alleged damages.

Since the last extension request, plaintiff has taken the depositions of two defendants. In addition to the activities outlined above, to date, the parties have responded to discovery demands, exchanged paper discovery, procured voluminous medical records, engaged in extensive case discussions and settlement negotiations, and taken plaintiff's deposition. At present, there are no contested discovery issues.

The parties do not feel it is likely that they will be able to complete discovery within this period, but are hopeful that a significant portion of discovery will be completed within this period

I thank the Court for its consideration of this request and apologize for its late hour.

Respectfully submitted,

/s

Robert Marinelli

cc: ACC Joseph Zangrilli